

JUROR NUMBER: _____ (the number on your badge)

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

State of Minnesota,

Plaintiff:

vs.

MOHAMED MOHAMED NOOR,

Defendant.

JURY QUESTIONNAIRE

Court File No. 27-CR-18-6859

TO PROSPECTIVE JURORS:

Please place your name and jury number at the top of this page.

The information in this questionnaire is for the judge and attorneys involved in this case. Remember that you are under oath. As you answer these questions, please keep in mind that there are no "right" or "wrong" answers. Please answer all of the questions as completely and honestly as you can. You must not discuss your answers with any of the other jurors. If you need help completing the questionnaire, ask one of the clerks for assistance.

If you want to make any additional comments, please use the additional blank page attached to the end of the questionnaire **(DO NOT WRITE ON THE BACK OF ANY PAGE)**. Thank you for your cooperation.

PERSONAL AND BACKGROUND INFORMATION

Juror Number: _____ Age: _____

1. Occupation: _____ Employer: _____

2. What city and neighborhood do you live in? _____

How long have you lived there? _____

How long have you lived in Hennepin County? _____

5. Please list other places you have lived over the past 10 years and approximately how long you lived at each.

6. What is your marital status?

☐ Married for ____ years ☐ Single ☐ Widowed for ____ years☐ Remarried for ____ years ☐ Living with Partner for ____ years☐ Separated /Divorced for ____ years

7. What are the ages, genders, and occupations of your children, if you have any? Please include children from your or a partner's previous relationship(s):

Age	Male or Female	Occupation	Age	Male or Female	Occupation

8. What are/were the occupations of your parents?

9. What is the highest level of education you completed?

- | | |
|--|---|
| <input type="checkbox"/> Less than high school | <input type="checkbox"/> Some college |
| <input type="checkbox"/> High school graduate | <input type="checkbox"/> College graduate |
| <input type="checkbox"/> Business/technical school | <input type="checkbox"/> Post-graduate work or degree |

If more than high school, please fill in below:

School Degree Major Area of Study

10. Are you currently: (please check all that apply)

- | | | |
|---|--|-----------------------------------|
| <input type="checkbox"/> Employed full time | <input type="checkbox"/> Employed at more than one job | <input type="checkbox"/> Retired |
| <input type="checkbox"/> Employed part time | <input type="checkbox"/> Temporarily laid off | <input type="checkbox"/> Disabled |
| <input type="checkbox"/> Unemployed | <input type="checkbox"/> Homemaker | <input type="checkbox"/> Student |

11. List all current and previous occupations and employers you have had in the last 10 years :

1 I. Do you have, or have you had, any management or supervising responsibilities in any of your jobs, including military service? ☐ Yes ☐ No

If yes, please explain: _____

12. Have you ever held any kind of leadership position at work or as part of any community organization? ☐ Yes ☐ No

If yes, please explain: _____

13. List the occupations and educational background of any other adults in your household and their relationship to you: _____

14. Has anyone close to you died as a result of another person's conduct? ☐ Yes ☐ No

If yes, please explain: _____

15. Do you own firearms? ☐ Yes ☐ No

If yes, please explain: _____

16. Mr. Mohamed Noor is a Somali-American citizen. Do you know any individuals of Somali decent? ☐ Yes ☐ No

Please explain who the person(s) is/are and how you know them: _____

17. Have you ever had any particularly positive **or** negative experiences with persons of Somali descent or heritage? ☐ Yes ☐ No

If yes, please explain: _____

18. Is there anything about Mohamed Noor's ethnicity that would be difficult for you to presume he is innocent of all charges against him? ☐ Yes ☐ No

If yes, please explain: _____

19. Have you or anyone close to you, ever (there is additional space for your answer below):

	Yes	No	Person	Explanation
Been a victim of a crime?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Witnessed a crime?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Been interviewed or questioned by the police?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Been interviewed or questioned by an investigator or attorney?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Been charged with or accused of a crime (including DWI)? What happened?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	

Been convicted of a crime (including DWI)?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Brought charges against someone'?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Asked for or received a restraining order or order for protection'?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Been the subject of a restraining order or order for protection'?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Been a witness in court?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Sued someone or been sued?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Been involved in any lawsuit or legal proceeding?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Been the victim of a crime that was not reported to police?			<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	

Please use the following black space for any explanation for answers in number 20.

20. Have you ever served on a jury or a grand jury? ☐ Yes ☐ No

21. What kind of case did you hear? _____

When and where did you serve on this jury? _____

Was this experience favorable? ☐ Yes ☐ No

Were you the foreperson? ☐ Yes ☐ No

Is there anything about your experience as a juror that would prevent you from being a fair and partial juror in this case? ☐ Yes ☐ No

If yes, please explain: _____

22. Have you or any of your family or close friends ever had any training or worked in any of the following fields:

	Person	Please Explain
Legal - attorney, legal secretary or assistant, investigator	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Courts - Judge, court clerk, court reporter	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Law Enforcement - police or sheriff's department, Highway Patrol, FBI	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Corrections - probation office, prison, halfway house	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Mental health - psychologist, counselor, psychiatrist, social worker, assistant	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Medicine - ambulance, hospital emergency room, emergency medical technician (EMT), physician	<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	

23. Have you ever served in the military? ☐ Yes ☐ No

If yes, list branch, rank at discharge, type of discharge, place, and date of service:

24. Please list any experiences with any **military** courts or police:

25. Please list any organizations you have belonged to or in which you participate. This could include veterans' groups, service clubs, social clubs, unions, professional, volunteer, neighborhood, educational, political groups, or church/temple/other religions:

26. Are you, or is anyone close to you, active in any organization concerned with crime, such as Neighborhood Crime Watch, Crime Stoppers, Victim Assistance, Mothers Against Drunk Drivers, American Civil Liberties Union, Innocence Project, or a law enforcement support organization? ☐ Yes ☐ No

If yes, is this:

☐ Yourself ☐ Spouse/partner ☐ Child ☐ Parent(s) ☐ Other family

Please list the organizations and describe your involvement: _____

27. Have you, or anyone you know, ever belonged to or donated time, money, or services to any organization that deals with the subject of physical abuse or assault? ☐ Yes ☐ No

If yes, is this:

☐ Yourself ☐ Spouse/partner ☐ Child ☐ Parent(s) ☐ Other family

Please list the organizations and describe your involvement: _____

28. Have you, or anyone you know, ever had contact with victims of physical abuse or assault through work, church, or some other organization or function? ☐ Yes ☐ No
29. If you have participated in any organization you listed in questions 26, 27, and 28 above, do you believe you could be a fair and impartial juror in this case? ☐ Yes ☐ No
30. Do you or do any of your family members or friends participate in any group that protests against police or government agencies? ☐ Yes ☐ No

If so, list the person, including self, the name of the organization, and dates active.

31. Do you or do any of your family members or friends participate in any group which discriminates against any race, or any group which claims superiority over other races? ☐ Yes ☐ No

If so, list the person, including self: the name of the organization, and dates active:

32. If you answered yes to either or both of the two questions directly above (30 and 31), have you ever held a leadership position in any such organization? ☐ Yes ☐ No
33. Have you, or has anyone close to you, ever been employed by or had any dealings with:

	No	Yes/Person	Yes/Please Explain
Hennepin County District Court		<input type="checkbox"/> Self-Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Hennepin County Attorney's Office		<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Hennepin County Sheriff's Department		<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Minnesota Bureau of Criminal Apprehension		<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	

Minneapolis Police Department		<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	
Any other City or County Law Enforcement Agency		<input type="checkbox"/> Self <input type="checkbox"/> Spouse <input type="checkbox"/> Family <input type="checkbox"/> Friend	

34. Have you ever had an experience involving law enforcement beyond that described in question number 33 above? ☐ Yes ☐ No

If yes, please explain: _____

35. Have you, or anyone you know, ever felt that they were treated unfairly by a police officer or other law enforcement officer? ☐ Yes ☐ No

If yes, please explain: _____

36. Have you ever had any contact with any member of the Minneapolis Police Department? ☐ Yes ☐ No

37. Do you have any beliefs or opinions about the Minneapolis Police Department in particular? ☐ Yes ☐ No

If yes, please explain: _____

38. You will be hearing testimony from a number of police officers in this case. Do you think you would give police officers more credibility, less credibility, or the same amount of credibility as other witnesses?

☐ More credibility ☐ Less Credibility ☐ Same Credibility

Please explain: _____

39. Is there anything about your contacts with the police that would cause you to be biased for or against the State of Minnesota or Mr. Noor in this case? ☐ Yes ☐ No

If yes, please explain: _____

40. At the time of the incident, Mohamed Noor was employed as a Minneapolis Police Officer. Is there anything about the nature of that employment that would cause you to be biased for or against Mr. Noor or the State of Minnesota in this case? ☐ Yes ☐ No

If yes, please explain: _____

41. Do you feel that the jury system in this county is a fair system? ☐ Yes ☐ No

Please explain: _____

42. How well do you feel our criminal justice system works?

43. What are your regular sources of news? (Check all that apply)

☐ Radio What stations? _____

☒ Television What channels? _____

☐ Newspapers What newspapers? _____

☒ Magazines What magazines? _____

☐ Internet What websites? _____

44. Do you watch any reality television shows that involve law enforcement agencies, law enforcement investigations, forensic evidence, or that regularly show video collected by law enforcement agencies, i.e., "Cops," "America's Most Wanted," et cetera?
- ☐ Yes ☐ No

If so, how often and how recently?

45. Do you watch any television shows that involved fictional crime stories, i.e., "CSI," "NCIS," "Law and Order," et cetera? ☐ Yes ☐ No

If so, how often and how recently?

TRIAL PUBLICITY

The defendant in this case, Mohamed Mohamed Noor, is charged with second-degree murder, third-degree murder, and second-degree manslaughter for causing the death of Justine Ruszczyk on July 15, 2017, in South Minneapolis, Hennepin County, Minnesota. Mr. Noor has pled not guilty and is presumed to be innocent of each of these charges unless and until he has been proven guilty beyond a reasonable doubt in this trial.

46. Have you read or heard anything about this case or the people involved, or did you see or hear any news reports about it? ☐ Yes ☐ No
47. If yes, please check all sources below from which you have received information about this case:
- ☐ Television
 - ☐ Tabloid news including print or online
 - ☐ Radio
 - ☐ Internet websites or news
 - ☐ Newspapers including print or online
 - ☐ Internet chat or comment site
 - ☐ Magazines including print or online
 - ☐ Social media (including but not limited to Facebook, Twitter, Instagram, etc.)
 - ☐ Any other social media or online source
 - ☐ Friends, family, neighbors

48. Which statement below BEST describes the amount and degree of information you have about the case? Check the statement that best applies.

- ☐ I have seen/heard enough to believe I know exactly what happened in this case.
- ☐ I have heard or seen a lot of information.
- ☐ I wouldn't say a lot of information, but where I have seen or heard coverage I was interested.
- ☐ I have heard or seen coverage but do not know much about the case.
- ☐ I have heard or seen coverage but have forgotten it.
- ☐ I have heard or seen very little about this case.
- ☐ I have never heard of this case before today.

49. If you have read or seen anything about this case prior to today, please describe what you heard or saw and when, to the best of your ability. Please be specific:

50. If you have heard about this case, what sticks out in your mind about Justine Ruszczyk, the woman who was shot?

51. If you have heard about this case, what sticks out in your mind about Mohamed Mohamed Noor, who, at the time, was a Minneapolis Police Officer?

52. Have you had any conversations with family members, friends, co-workers, or other people you know about this case? ☐ Yes ☐ No

IF YOU ANSWERED YES, have any of those people expressed to you an opinion about the guilt or innocence of Mohamed Mohamed Noor in this case?

53. If you have read about, heard about, or talked about this case, does anything you've read, heard, or discussed affect your ability to presume Mohamed Mohamed Noor innocent of the charges against him? ☐ Yes ☐ No

If yes, please explain: _____

54. Is there any reason why you think you might have difficulty being completely impartial in this case or any other reason why you feel you couldn't or shouldn't sit as a juror in this case? ☐ Yes ☐ No

If yes, please explain: _____

55. Do you, or anyone you are close to, know or do business with or have any other kind of social or personal connection with any of the following people, attorneys, or law offices?

	No Connection	Have heard of	Know or have met	Know someone with a connection
Judge Kathryn Quaintance				
Mohamed Mohamed Noor				
Michael Freeman				
Amy Sweasy				
Patrick Lofton				
Thomas Plunkett				
Peter Wold				

56. Under our system of justice, a defendant is presumed innocent of the criminal charges against him. Do you agree with this principle of law? ☐ Yes ☐ No

If no, please explain: _____

57. Under our system of justice, the prosecution has the burden of proving the defendant guilty beyond a reasonable doubt. Do you agree with this principle of law?

☐ Yes ☐ No

If no, please explain: _____

58. The jury in this case will be instructed not to read, watch, listen to, or access the internet for any news accounts of this trial until it is over, and not to talk to anyone about the case, not even to one another, until the jury deliberations. Would you find it difficult to follow such instructions for any reason? ☐ Yes ☐ No

If yes, please explain: _____

59. Is there any reason why you would not be able to give your complete attention to this trial over the next three to four weeks? ☐ Yes ☐ No

If yes, please explain: _____

60. Do you have any religious or philosophical beliefs which would make it difficult for you to do the job of a juror:

- to listen attentively to the evidence
- after instructions on the law to confer with your fellow jurors in order to determine whether the charged crime(s) occurred
- and, if so, whether this defendant committed said crime(s)

☐ Yes ☐ No

If yes, please explain: _____

61. Do you have any medical, visual, hearing, physical, or other impairment that may affect your ability to serve as a juror on this case? ☐ Yes ☐ No

If yes, please explain: _____

62. Because this case involves a death by gunshot, there will be medical examiner testimony and autopsy photos, as well as body camera footage from the scene that is graphic. Do you anticipate that you would have trouble listening to or viewing this evidence?

If yes, please explain: _____

63. Is there anything else the judge and attorneys should know about your ability to be fair in relation to serving on this jury? ☐ Yes ☐ No

If yes, please explain: _____

64. Do you have any major conflict such as a non-refundable ticket that would interfere with your ability to serve between now and May 1, 2019?

65. Is there any subject covered in this questionnaire that you would not want to discuss in front of the other jurors in open court? ☐ Yes ☐ No

What question or questions are those (feel free to write additional comments on the last page of this questionnaire)?

66. Please read the attached list of potential witnesses and circle the names of any of the witnesses with whom you or someone you know has an association or whom you think you recognize.

I affirm, under penalty of perjury, that I have given complete and honest answers to all of the questions above.

Signature

Date

Please use the following blank space for any additional comments.

